

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

CELLULAR COMMUNICATIONS EQUIPMENT LLC,	§	
	§	
Plaintiff,	§	Civil Action No. 6:14-cv-00251-
	§	KNM
v.	§	
	§	
APPLE INC., et al.,	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	

JOINT SUBMISSION OF JURY MATERIALS

Plaintiff, Cellular Communications Equipment LLC (“CCE” or “Plaintiff”), and Defendants Apple Inc. (“Apple”), AT&T Mobility LLC (“AT&T”), Cellco Partnership d/b/a Verizon Wireless (“Verizon”), Sprint Solutions, Inc. and Sprint Spectrum L.P. (collectively “Sprint”), and Boost Mobile, T-Mobile USA, Inc., and T-Mobile US, Inc. (collectively “T-Mobile”)¹ hereby submit the following jury materials:

Attached as **Exhibit A** hereto are CCE’s Proposed Preliminary Jury Instructions.

Attached as **Exhibit B** hereto are Defendants’ Proposed Preliminary Jury Instructions.

Attached as **Exhibit C** hereto are CCE’s Proposed Final Jury Instructions.

Attached as **Exhibit D** hereto are Defendants’ Proposed Final Jury Instructions.

Attached as **Exhibit E** hereto is CCE’s Proposed Verdict Form.

Attached as **Exhibit F** hereto is Defendants’ Proposed Verdict Form.

The parties do not waive the right to request such additional or supplemental instructions as may be necessary in light of the evidence and argument presented. Additionally, the parties

¹ Defendants Apple, AT&T, Verizon, Sprint, and T-Mobile are referred to collectively as “Defendants.”

do not waive any objections to issues that are the subject of pending or anticipated motions, including *Daubert* motions, motions to strike, motions for summary judgment, and motions *in limine*. By submitting these instructions, the parties do not intend to waive or affect their ability to bring any motion under Federal Rule of Civil Procedure 50. The parties do not waive their rights to assert objections to the Court's instructions as provided for by Rule 51 of the Federal Rules of Civil Procedure. By offering competing instructions, Defendants note their objection to Plaintiff's proposed instructions, and Plaintiff notes its objection to Defendants' proposed instructions. The parties further respectfully reserve their right to object to any modification to their respective proposed instructions and expressly preserve all objections thereto. Similarly, the parties respectfully reserve their right to object to the removal of any part of their respective proposed instructions.

The parties have agreed, as the trial progresses, to meet and confer regarding the competing instructions, but they reserve their right to bring those objections to the Court for resolution.

DATED: August 23, 2016

Respectfully submitted,

/s/ Bradley W. Caldwell

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 23, 2016 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Bradley W. Caldwell
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